

Presented to the Court by the foreman of the
Grand Jury in open Court, in the presence of
the Grand Jury and FILED in the U.S.
DISTRICT COURT at Seattle, Washington.

October 14th 2015
WILLIAM M. McCOOL, Clerk
By A. Elvington Deputy

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

PAUL G. HURLEY,

Defendant.

NO.

CR15-336 Jcc

INDICTMENT

The Grand Jury charges that:

COUNT 1

(Soliciting And Agreeing To Receive a Bribe By A Public Official)

On or about September 11, 2015, at Seattle, in the Western District of
Washington, the defendant, PAUL G. HURLEY, a public official, directly and indirectly
did corruptly demand, seek, and agree to receive and accept something of value
personally, in return for being influenced in the performance of an official act, and being
induced to do and omit any act in violation of his official duty; that is \$20,000 in
connection with the conduct of his duties as an Internal Revenue Service ("IRS")
Revenue Agent and assessment of taxes during the examination and audit of a taxpayer.

All in violation of Title 18, United States Code, Section 201(b)(2).

COUNT 2
(Receiving A Bribe By A Public Official)

On or about September 16, 2015, at Seattle, in the Western District of Washington, the defendant, PAUL G. HURLEY, a public official, directly and indirectly did corruptly receive and accept something of value personally, in return for being influenced in the performance of an official act, and being induced to do and omit any act in violation of his official duty; that is \$5,000 in connection with the conduct of his duties as an IRS Revenue Agent and assessment of taxes during the examination and audit of a taxpayer.

All in violation of Title 18, United States Code, Section 201(b)(2).

COUNT 3
(Receiving A Bribe By A Public Official)

On or about September 21, 2015, at Seattle, in the Western District of Washington, the defendant, PAUL G. HURLEY, a public official, directly and indirectly did corruptly receive and accept something of value personally, in return for being influenced in the performance of an official act, and being induced to do and omit any act

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1 in violation of his official duty; that is \$15,000 in connection with the conduct of his
2 duties as an IRS Revenue Agent and assessment of taxes during the examination and
3 audit of a taxpayer.

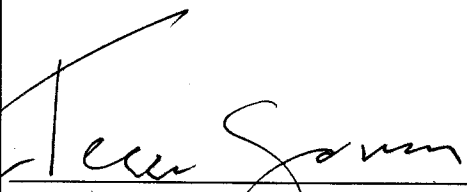
4 All in violation of Title 18, United States Code, Section 201(b)(2).


6 A TRUE BILL:


8 DATED: 10 - 14 - 15

10 *[Signature of Foreperson redacted pursuant*
11 *to the policy of the Judicial Conference of*
12 *the United States]*

13 _____
14 FOREPERSON

15 
16 ANNETTE L. HAYES
17 United States Attorney

18 
19 ANDREW FRIEDMAN
20 Assistant United States Attorney

21 
22 JUSTIN W. ARNOLD
23 Assistant United States Attorney